

North London Waste Plan to 2035

Main Matter 4 – Soundness

Supplementary Hearing Statement

(Responses from North London Boroughs to Question 49: Is the site and area search and selection process (methodology) clear, robust and justified?)



**The Pinkham Way Alliance
Representor No 36**

14 November 2019

Contents

1.	Introduction	1
2.	Material errors in evidence base	2
3.	Conclusion	4

Introduction

This Supplementary Hearing Statement is submitted on behalf of the Pinkham Way Alliance (PWA)

Pinkham Way Alliance is a community campaign group which came together in early 2011 when residents living in the surrounding area of the Pinkham Way site became concerned about plans by the North London Waste Authority (NLWA) to develop the site for a large scale MBT waste facility.

Since then, PWA has taken an active interest in and has participated in the preparation of the original Submission version of the North London Waste Plan, the Haringey Local Plan: Strategic Policies document and the Haringey Site Allocations DPD, having made representations to and appeared at the examinations in public of all those plans.

PWA has approximately 3000 supporters

1. PWA comment on Boroughs response to Question 49

1.1 Material error in evidence base has come to light

- 1.2 It has become clear from reading the Boroughs' Responses, in Question 49 para 49.2 iii) and iv) and from closer examination of the London Industrial Land Supply & Economy Study 2015 (AECOM Study) that the methodology used in the NLWP was not robust or justified.
- 1.3 Although preparation of the AECOM Study included a borough engagement exercise to ensure that the information was correct¹ the Study is contaminated by false information and fundamental errors relating to the Pinkham Way site.
- 1.4 The Boroughs cited the AECOM Study in their preparation of the NLWP² and presumably have examined it thoroughly whilst doing so. Given that the Pinkham Way site has been controversial and under close scrutiny by the Boroughs and the local community since the last iteration of the NLWP, it is surprising that the errors were not quickly noticed by Haringey Council or picked up by at least one of the other six North London boroughs involved in the NLWP.
- 1.5 As no reference has been made to these errors, they have presumably been carried into the Draft London Plan process and the associated Land for Industry and Transport SPG. It would be helpful if the Inspector could indicate how these errors might be corrected.
- 1.6 The AECOM Study was prepared for the GLA to inform industrial land policymaking in the review of the Draft London Plan and associated Land for Industry and Transport SPG and has recently been cited as a source in a 2017 GLA publication.³
- 1.7 Astonishingly the AECOM Study incorrectly records the planning designation of the Pinkham Way site as LSIS⁴ and as Vacant Industrial Land.⁵ (Appendices 1 and 2 attached)
- 1.8 The Study defines vacant industrial land as sites which are either
- 1.8.1 (i) vacant and cleared **and** have land with derelict industrial buildings **or**
- 1.8.2 (ii) have vacant buildings capable of occupation
- 1.9 The Pinkham Way site does not fall within either definition of vacant industrial land. It is not "vacant and cleared" and there are no buildings on it. During the Haringey Local Plan hearing in 2012 it was confirmed that Pinkham Way is not an established industrial site⁶. However, it now appears that it is inserted in the AECOM Study as vacant industrial land, see below.

¹ London Industrial Land Supply & Economy Study Appendices: pp6 Engagement with Boroughs

² NLWP Sites and Areas Report January 2019 paragraphs 4.50 – 4.63

³ GLA Industrial Land Demand – a report by CAG Consultants in association with Colliers, Radmidus Consulting and Peter Brett Associates, October 2017

⁴ MM4 Q49 PWA Appendix 1 London Industrial Land Supply & Economy Study Figure 2-2 Industrial Land in London by Designation pp29-30

⁵ MM4 Q49 PWA Appendix 2 London Industrial Land Supply & Economy Study Figure 2-7 Vacant Industrial Land and Land with vacant buildings

⁶ 2012 Inspector's Report - Haringey Local Plan: the Inspector required an MM in the Plan to clarify the difference between LSIS and Employment Land designations (MM 189 p33 (PINS/Y5420/429/4). (A senior Consultant from Atkins attended the Haringey Local Plan EiP hearing on behalf of the Council and in reply to questions from the Inspector confirmed that it could not be considered established industrial land.)

- 1.10 Table 2-4 of the AECOM Study shows a figure of 11.3ha vacant industrial land in Haringey⁷. This figure is carried into Table 5 of the NLWP Sites and Areas Report.⁸ We would ask the Inspector to clarify whether it includes the Pinkham Way site. (see Appendix 3 attached)
- 1.11 Table 6 of the NLWP Sites and Areas Report⁹ shows Total Land in Industrial use in Haringey as 154.9ha, again carried over from the AECOM Study.¹⁰ (See Appendix 4 attached)
- 1.12 Table 7 of the NLWP Sites and Areas Report shows that the figure for vacant industrial land in Haringey as a percentage of all core and wider uses (7.3%) to be the highest of the seven North London boroughs. This figure has plainly been reached by dividing the vacant industrial land (in which the AECOM Report incorrectly appears to include Pinkham Way) by the total industrial land in use. We would ask the Inspector to clarify whether this is so.
- 1.13 Paragraph 4.63 of the NLWP Sites and Areas Report concludes that “the estimated 5ha of current vacant industrial land in North London provides sufficient opportunity to meet waste management needs in North London in the short term”. Could the Inspector please clarify whether this land includes the Pinkham Way site/area.
- 1.14 Paragraph 8.25 of the NLWP distinguishes between industrial land and ‘high-performing (Band B) sites/areas’. The AECOM report categorises Pinkham Way as industrial land. Could the Inspector clarify which sites fall into the category of ‘high-performing (Band B) sites / areas’ and which fall into the industrial land category?
- 1.15 The designation of the Pinkham Way site as SINC/Employment Land was confirmed in 2012 in the Local Plan EiP following an unsuccessful attempt to change it to LSIS. We are concerned that there appears to be a pattern of misrepresentation occurring around the designation of the site and a determination to label it as suitable for industrial development. This is not the first time that its designation has been misreported.
- 1.16 On 2nd February 2017, a Senior Haringey Planning Policy Officer gave false reassurance to the NLWA that “... *strategic policy continues to list the Pinkham Way site as a designated LSIS in Strategic Policy SP8.*”¹¹
- 1.17 On 20th February 2017, Haringey’s Assistant Director of Planning sent a second false reassurance, misrepresenting not only the Council’s planning designation of the site but also the contents of the SADPD Inspector’s decision letter. That memo included “... *Both the Inspector and the Council are content that the site is needed for employment use to meet the identified employment needs. The employment need is also confirmed through the site’s designation as an LSIS in Strategic Policy SP8*”¹²

The Inspector’s report actually stated:

*“... Pinkham Way is designated as a Local Employment Area: Employment Land in the SP. Although the site was a former sewage works, it has been vacant for many years. There is no purpose to its inclusion in the SADPD **as development is not identified to come forward within the plan period***

⁷ MM4 Q 49 Appendix 3 Table 2-4: Vacant Industrial Land in London AECOM Study 2015

⁸ NLWP Sites and Areas Report January 2019 paragraph 4.51 Table 5

⁹ NLWP Sites and Areas Report January 2019 paragraph 4.52 Table 6

¹⁰ MM4 Q 49 Appendix 4 Extract – GLA Land use categorisations - Vacant Industrial Land in London AECOM Study Appendices pp62 and 63

¹¹ NLWP Representations Reg 19 Representor order August 2019 Appendix 2 [part 1]: LBH NLWA PW 02 Feb 2017 pp264

¹² NLWP Representations Reg 19 Representor order August 2019 Appendix 2 [part 3]: LBH NLWA PW 20 Feb 2017 P266

*and it has no role within the SADPD to meet ASP objectives. The allocation is therefore unnecessary and SAMM99 removes the designation from the SADPD.*¹³

1.18 There is an additional error in the Sites and Areas Report at paras 4.65 – 4.66 and Table 10. The Pinkham Way site is included in Table 10 as a Site with Spatial Attributes A and B. It is not an existing site and does not fall within the category of sites with Spatial Attribute A. We can produce evidence to support this at the hearing.

1.19 **Conclusion**

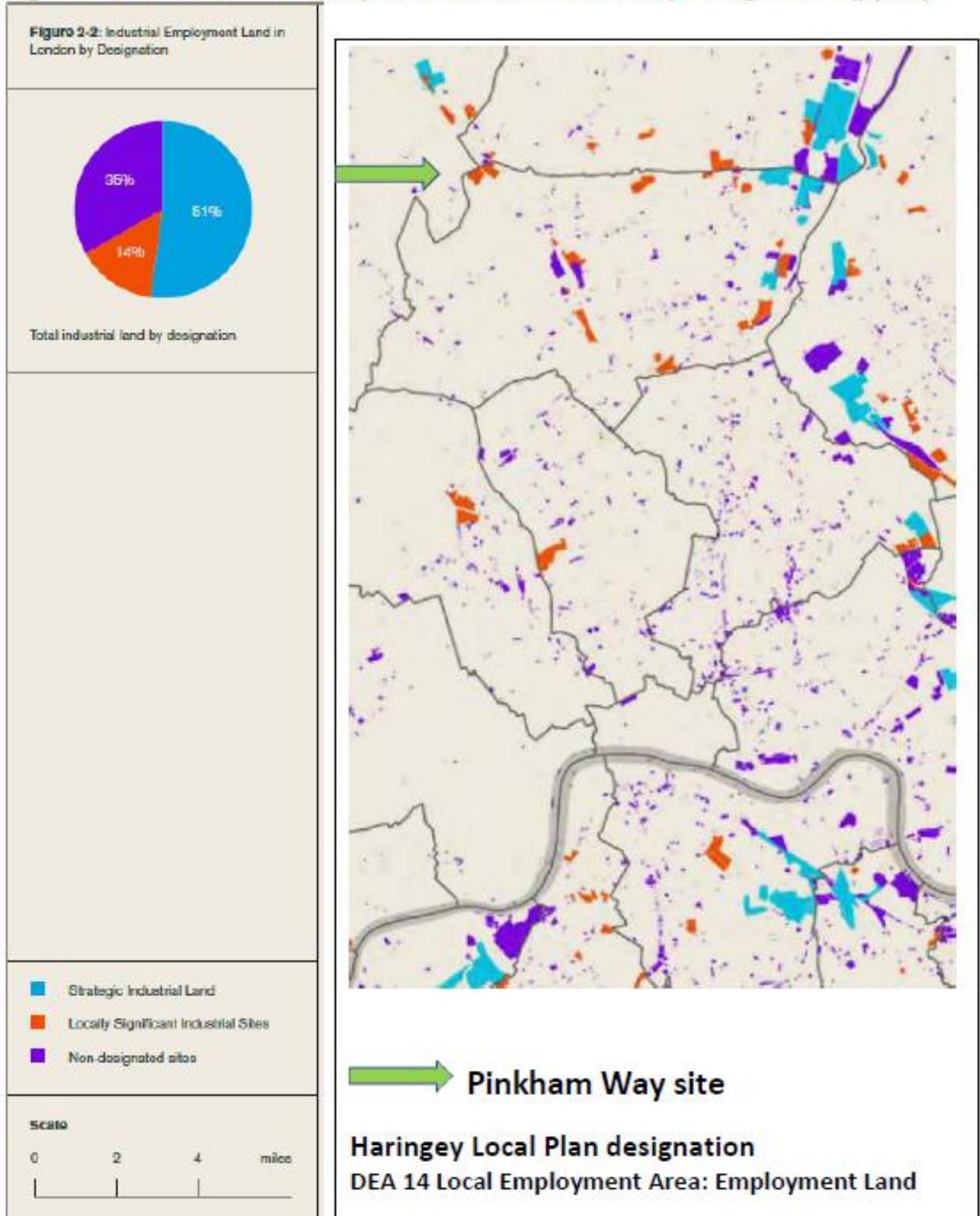
There is now uncertainty on the face of the record as to the accurate planning designation/s for the Pinkham Way site, and about the accuracy of the figures in the NLWP Sites and Areas Report Tables. There is also doubt about whether the NLWP has been positively prepared, particularly insofar as the inclusion of the Pinkham Way site is concerned. Unless corrected quickly, the inaccuracy of the AECOM Study is likely to contaminate future industrial land policy making in London. We would once again invite the Inspector to remove the Pinkham Way site from the NLWP.

¹³ Inspector's Report on the Examination of the Site Allocations Development Plan Document, para 75 pp18 PINS/Y5420/429/9, PINS/Y5420/429/10, PINS/Y5420/429/11, PINS/Y5420/429/12

MM4 Q 49 – Supplementary Appendix 1

London Industrial Land Supply & Economy Study 2015 (March 2016)

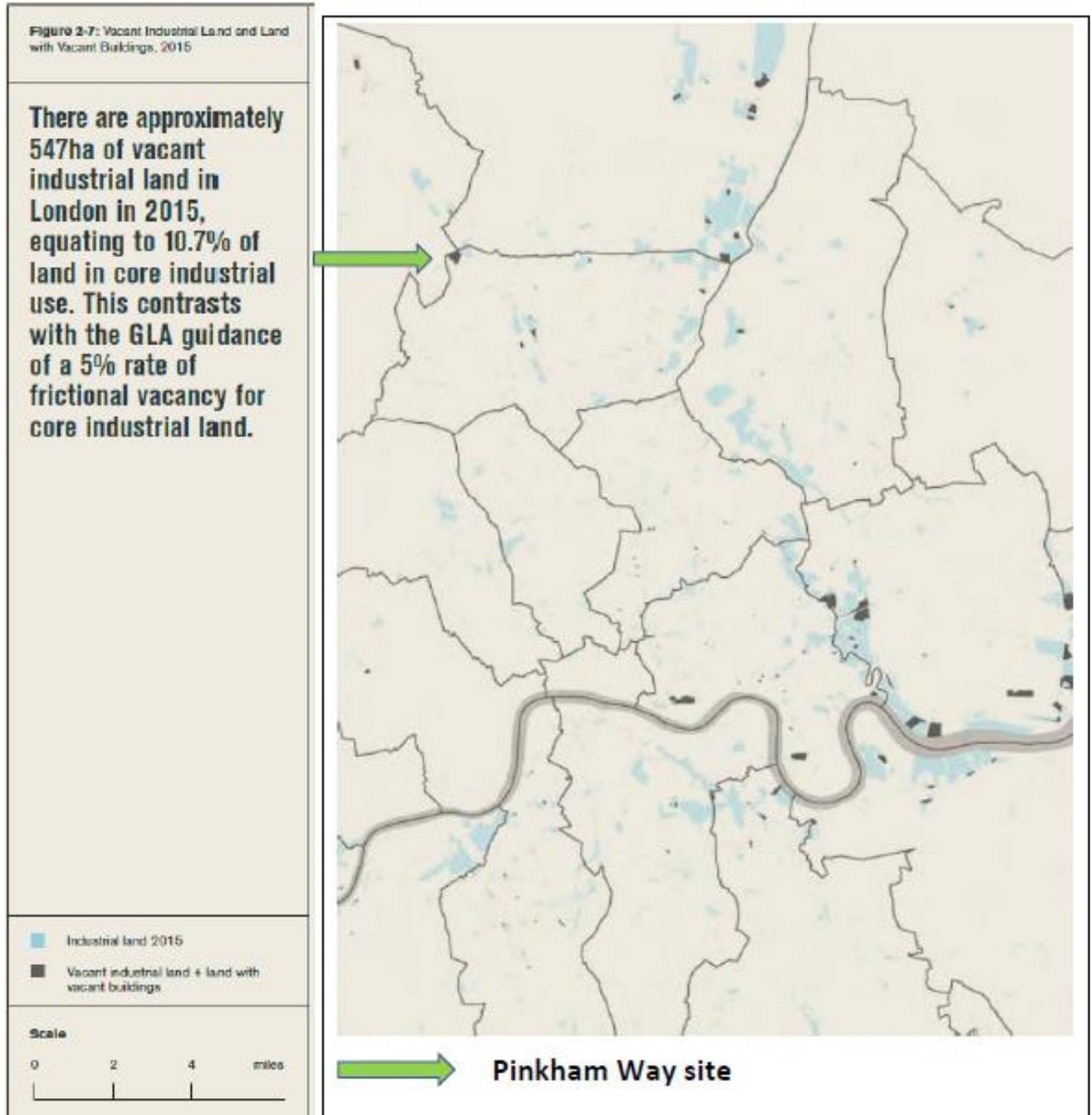
Figure 2-2: Industrial Employment Land in London by Designation (pp30)



MM4 Q 49 – Supplementary Appendix 2

London Industrial Land Supply & Economy Study 2015 (March 2016)

Figure 2-7: Vacant Industrial Land and Land with vacant buildings (Extracted)



vacant industrial land is defined as sites which are either

- (i) vacant and cleared and have land with derelict industrial buildings or
- (ii) have vacant buildings capable of occupation (Pinkham Way is an open green space with high environmental value - no buildings)

MM4 Q 49 – Supplementary Appendix 3

London Industrial Land Supply & Economy Study 2015 (March 2016)

Table 2-4: Vacant Industrial Land in London

Table 2-4: Vacant Industrial Land in London

		Vacant cleared sites and derelict industrial buildings (ha)	Industrial land with vacant buildings (ha)	Total vacant industrial land (ha)	Vacant industrial land as % of all core uses	Vacant industrial land as % of all core and wider uses
London		414.7	132.0	546.8	10.7%	7.8%
CAZ		2.1	1.4	3.5	75%	3.7%
Inner London		129.9	95.2	162.0	14.4%	9.6%
Outer London		287.9	96.8	384.7	9.7%	7.3%
Central sub-region		6.0	2.3	8.3	3.6%	2.5%
	Camden	0.3	-	0.3	0.0%	0.8%
	City of London	-	-	-	n/a	n/a
	Kensington & Chelsea	1.4	0.1	1.5	17.7%	8.0%
	Islington	0.0	0.1	0.2	0.7%	0.5%
	Southwark	2.0	-	2.0	2.0%	1.4%
	Westminster	0.7	-	0.7	14.5%	5.9%
	Lambeth	1.5	2.1	3.6	6.0%	4.7%
East sub-region		271.4	73.6	345.0	16.2%	12.3%
	Barking & Dagenham	30.2	31.3	61.5	12.9%	11.9%
	Bexley	61.1	6.6	67.7	17.1%	12.9%
	Greenwich	17.8	0.3	18.0	9.0%	7.7%
	Hackney	1.5	0.6	2.2	4.7%	3.0%
	Havering	57.2	2.8	59.9	17.5%	13.7%
	Lewisham	4.1	1.5	5.6	7.5%	5.2%
	Newham	90.1	14.4	104.5	34.1%	20.3%
	Redbridge	1.7	2.0	3.7	6.8%	5.6%
	Tower Hamlets	5.8	13.8	19.6	16.7%	12.7%
	Waltham Forest	1.9	0.4	2.3	1.9%	1.1%
North sub-region		41.1	0.7	41.9	7.7%	5.8%
	Barnet	5.8	0.4	6.2	8.4%	6.0%
	Enfield	24.0	0.3	24.3	7.2%	5.3%
	Haringey	11.3	-	11.3	8.7%	7.9%
South sub-region		34.1	11.4	45.5	6.7%	4.1%
	Bromley	8.9	0.3	9.2	9.9%	6.6%
	Croydon	7.4	2.2	9.6	7.2%	5.9%
	Kingston upon Thames	0.2	0.7	0.9	1.4%	0.8%
	Merton	4.2	5.2	9.4	6.3%	5.6%
	Richmond upon Thames	0.5	0.2	0.7	2.6%	1.8%
	Sutton	12.6	2.5	15.1	11.8%	4.5%
	Wandsworth	0.3	0.4	0.7	0.8%	0.5%
West sub-region		62.2	44.0	106.2	7.0%	5.3%
	Brent	8.1	-	8.1	2.5%	1.9%
	Ealing	14.9	2.0	16.9	4.1%	3.3%
	Hammersmith & Fulham	1.3	2.0	3.2	5.6%	2.9%
	Harrow	4.3	0.5	4.9	8.6%	7.6%
	Hillingdon	16.4	22.1	38.5	11.9%	9.7%
	Hounslow	17.1	17.5	34.6	10.4%	7.2%

SOURCE: ECO M



MM4 Q 49 Supplementary Appendix 4:

Extract – GLA Land Use Categorisations 2015

London Industrial Land Supply & Economy Study 2015 (March 2016)

Haringey GLA land use categorisations	2010					2015				
	Designated employment land (ha)			Non-designated employment land (ha)	Total	Designated employment land (ha)			Non-designated employment land (ha)	Total
	SIL	LSIS	Total			SIL	LSIS	Total		
Industrial uses										
Core industrial uses										
Light industry	0.0	1.0	1.0	0.0	1.0	0.0	1.1	1.1	0.0	1.1
General industry	7.4	18.4	25.9	19.1	45.0	2.8	17.9	20.7	14.3	34.9
Warehouses	98.8	25.5	60.9	13.1	73.4	93.5	25.2	58.7	15.5	74.2
Self storage	0.0	6.7	6.7	0.0	6.7	0.0	7.8	7.8	0.0	7.8
Open storage	0.0	0.7	0.7	0.0	0.7	0.0	1.3	1.3	0.1	1.5
Sub total	44.2	50.3	94.5	32.2	126.7	96.3	53.1	99.4	29.9	119.3
Wider industrial uses										
Wholesale markets	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Waste management and recycling	0.3	1.4	1.7	2.3	4.0	0.3	0.2	0.4	3.8	4.0
Utilities	0.0	0.8	0.8	12.0	12.9	0.4	0.0	0.4	19.5	19.8
Land for rail (including DLR)	1.9	0.0	1.9	0.9	2.8	2.7	0.0	2.7	0.1	2.8
Land for buses	1.2	1.1	2.2	1.2	3.4	2.2	0.0	2.2	1.2	3.4
Airport related land and freight	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Docks	0.0	0.0	0.0	0.2	0.2	0.0	0.0	0.0	0.2	0.2
Other industrial	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Sub total	3.3	3.3	6.6	16.6	23.2	5.5	0.2	5.7	18.5	24.2
Vacant										
Vacant industrial land*	2.4	11.6	14.0	2.7	16.7	1.3	7.1	8.4	9.0	11.3
Land with vacant building(s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total industrial	50.0	65.1	115.1	51.6	166.7	43.1	60.4	103.5	51.4	154.9
Non-industrial uses										
Office	2.3	8.5	10.8	n/a	10.8	0.0	3.8	3.8	n/a	3.8
Retail	0.8	1.0	1.8	n/a	1.8	0.7	1.0	1.7	n/a	1.7
Residential	0.4	0.5	0.9	n/a	0.9	0.4	0.4	0.7	n/a	0.7
Recreation and leisure	0.0	0.1	0.1	n/a	0.1	0.0	0.1	0.1	n/a	0.1
Community services	0.5	1.0	1.5	n/a	1.5	0.5	1.3	1.8	n/a	1.8
Defence	0.0	0.0	0.0	n/a	0.0	0.0	0.0	0.0	n/a	0.0
Agriculture and fisheries	0.0	0.0	0.0	n/a	0.0	0.0	0.0	0.0	n/a	0.0
Mixed-use (non industrial only)	0.0	0.0	0.0	n/a	0.0	0.0	3.1	3.1	n/a	3.1
Other non-industrial	0.0	0.7	0.7	n/a	0.7	0.0	0.3	0.3	n/a	0.3
Total non-industrial	4.0	11.7	15.7	n/a	15.7	1.6	9.9	11.6	n/a	11.6
Total	54.0	76.9	130.8	n/a	182.4	44.7	70.4	115.1	n/a	166.5

Source: AECOM